

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|--|---|---|
| In re: |) | |
| |) | Chapter 11 |
| JOANN INC., <i>et al.</i> , ¹ |) | Case No. 25-10068 (CTG) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| |) | Re: Docket Nos. 760, 930 & 995 |

**CERTIFICATION OF COUNSEL REGARDING AMENDED FIRST
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the “Plan Administrator”), hereby certifies as follows:

1. On May 12, 2025, the debtors and debtors-in-possession in the above-captioned cases (the “Debtors”) filed the *Third Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 847] (the “Third Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the Third Assumption Notice (the “Original Assumption List”).

2. On May 16, 2025, the Debtors filed the *Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 930] (the “Amended First Assumption Notice”). Attached as Schedule 2 to the Amended First Assumption Notice was a revised schedule of unexpired leases (the “Revised Assumption List”). Attached as Schedule 3 to the Amended First Assumption Notice was a proposed form of order (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

“Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Revised Assumption List.

3. The deadline to object to the Amended First Assumption Notice was May 30, 2025 (the “Objection Deadline”).

4. On May 27, 2025, the landlord of Store No. 2573 (the “Landlord”) filed the *Objection and Reservation of Rights of Cahill Road Partners, LLC, J2H 127 Building, LLC, 2075 Ford Parkway, LLC, and EBH 127 Building, LLC to Third Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases and Amended First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 995] (the “Objection”).

5. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”), which the Landlord has confirmed resolves the Objection. A blackline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

6. Any unresolved objections and informal comments received regarding the remaining balance of the leases included in the Amended First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Amended First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases.

7. Accordingly, the Plan Administrator requests entry of the Revised Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

Dated: July 30, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Jack M. Dougherty (No. 6784)

Michael E. Fitzpatrick (No. 6797)

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com

jdougherty@coleschotz.com

mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)

200 Public Square, Suite 2800

Cleveland, Ohio 44114

Telephone: (216) 274-2489

Facsimile: (216) 241-2824

Email: cwick@hahnlaw.com

Co-Counsel to the Plan Administrator